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May 13, 2004

Secretary Tommy G. Thompson
The U.S. Department of Health and Human Services
200 Independence Avenue, S.W.
Washington, D.C. 20201

Dear Secretary Thompson:

I am writing to you about paruresis (shy bladder syndrome), the new proposed HHS drug testing regulations for federal employees, and their impact on employees across the country. In addition, I am to meet with you to discuss how these regulations should be amended.

Paruresis affects approximately 17 million people (7%) in the U.S, to varying degrees of severity. This social anxiety disorder (DSM-IVTR) AND chronic pelvic floor dysfunction can severely impact a person's life, interfering with such life activities as employment, social relationships and travel. Moreover, in very severe cases, the chronic depression caused by it can lead to suicide or attempted suicide.

There are a number of cases of workers having been fired because of the way in which drug testing regulations are interpreted and enforced in this country. Very soon, an ADA lawsuit will be filed against a Fortune 500 company for summarily dismissing a worker who could not give a urine sample in three hours, yet tested negatively on an alternative hair test later.

The new HHS drug testing regulations are a step in the right direction, but they fail to protect (and one may argue they actually discriminate against) people with paruresis. Essentially, while the new regulations allow for alternatives to urine drug testing, these alternatives are IN ADDITION TO urine tests, not instead of urine tests. Consequently, people with paruresis will still not be provided with reasonable accommodation for their affliction.

Hundreds if not thousands of workers in this country have been unfairly terminated from their jobs because of current drug testing regulations. Something must be done to change this situation.

I look forward to hearing from you in the very near future.

Sincerely



Steven Soifer, Ph.D., LGSW
Executive Director, IPA
Associate Professor of Social Work
University of Maryland

cc: Honorable Senator Barbara Mikulski